UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

S.B., a minor student, by and through his parents,)
M.B. and L.H., et al.,)
Plaintiffs,)
v.) No. 3:21-cv-00317-JRG-DCP
GOVERNOR BILL LEE, in his official)
capacity as GOVERNOR OF TENNESSEE, and)
KNOX COUNTY BOARD OF EDUCATION,	
)
Defendants.)

JOINT NOTICE OF SETTLEMENT

Pursuant to E.D. Tenn. L.R. 68.1, the parties, Plaintiffs S.B., M.S., M.K., and T.W., by and through their parents, and Defendant Bill Lee, Governor of the State of Tennessee, hereby provide notice that they have reached a tentative agreement to settle Plaintiffs' request for attorney's fees and costs and to dismiss Plaintiffs' claims against the Governor. The tentative agreement is subject to the approval of the parties of mutually agreeable settlement documentation and the approval of the appropriate State of Tennessee constitutional officials in accordance with Tenn. Code Ann. § 20-13-103. Once approved, the parties will file a joint stipulation of dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A) and E.D. Tenn. L.R. 68.1.

Pursuant to this notice, the parties jointly request that the Court stay any filing deadlines until further notice is provided.

Respectfully submitted,

HERBERT H. SLATERY III ATTORNEY GENERAL AND REPORTER

/s/ Reed N. Smith

*Reed N. Smith VA Bar No. 77334
Assistant Attorney General
Martha H. McCampbell TN BPR No. 013265
Assistant Attorney General
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, Tennessee 37202
(615) 741-9593
Reed.Smith@ag.tn.gov
Marty.McCampbell@ag.tn.gov
*Admitted Pro Hac Vice

Counsel for Defendant Governor Bill Lee

GILBERT LAW, PLC

/s/ Justin S. Gilbert

Justin S. Gilbert TN BPR No. 017079 100 W. Martin Luther King Blvd, Suite 501 Chattanooga, TN 37402 (423) 756-8203 justin@schoolandworklaw.com

Counsel for Plaintiffs

THE SALONUS FIRM, PLC

/s/ Jessica F. Salonus

Jessica F. Salonus TN BPR No. 28158 139 Stonebridge Blvd Jackson, Tennessee 38305 Phone: (731) 300-0970 Facsimile: (731) 256-5711 jsalonus@salonusfirm.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this the 18th day of July 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing report. Parties may access this filing through the Court's electronic filing system.

/s/ Reed N. Smith
Reed N. Smith, (VA BN 77334)*
Assistant Attorney General
-Admitted pro hac vice